

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: CELSIUS NETWORK LLC, <i>et al.</i> , ¹ Debtors.	Chapter 11 Case No. 22-10964 (MG) Jointly Administered
CELSIUS NETWORK LIMITED, Plaintiff, v. STAKEHOUND SA, Defendant.	Adversary Proceeding No. 23-01138 (MG)

**REPLY DECLARATION OF MITCHELL P. HURLEY IN FURTHER SUPPORT OF
PLAINTIFF CELSIUS NETWORK LIMITED’S MOTION FOR A PRELIMINARY
INJUNCTION PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE
7065 AND FEDERAL RULE OF CIVIL PROCEDURE 65**

1. I am a partner with the law firm of Akin Gump Strauss Hauer & Feld LLP (“Akin”), special litigation counsel for Plaintiff Celsius Network Limited (“Celsius”) in the above-captioned adversary proceeding (the “Adversary Proceeding”). I am admitted to practice before this Court.

2. I submit this reply declaration (the “Reply Declaration”) in further support of Celsius’ motion for a preliminary injunction against Defendant StakeHound SA (“StakeHound”) pursuant to Federal Rule of Bankruptcy Procedure 7065 and Federal Rule of Civil Procedure 65 (the “Motion”) filed on August 25, 2023 [ECF No. 47]. Except as otherwise indicated, all facts

¹ The Debtors in these chapter 11 cases (the “Chapter 11 Cases”), along with the last four digits of each Debtor’s federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 Ltd. (1209); GK8 UK Limited (0893); and GK8 USA LLC (9450). The Debtors’ service address in these Chapter 11 Cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

set forth herein are based on my personal knowledge and documents and information available to me as special litigation counsel to the Debtors and Celsius.

3. Attached hereto as Exhibit A is a true and correct copy of an August 7, 2023 email from Celsius' counsel to StakeHound's counsel at Locke Lord LLP: Stephanie Wickouski, Jonathan Young and Sean Feener.

4. Attached hereto as Exhibit B is a true and correct copy of an August 8, 2023 email from Celsius' counsel to Stephanie Wickouski, Jonathan Young and Sean Feener.

5. Attached hereto as Exhibit C is a true and correct copy of a September 4, 2023 email from Celsius' counsel to Stephanie Wickouski, Jonathan Young, Sean Feener and Jeffrey Kramer of Locke Lord LLP.

6. Attached hereto as Exhibit D is a true and correct copy of a September 6, 2023 email from myself to Stephanie Wickouski, Sean Feener and Jeffrey Kramer.

7. Attached hereto as Exhibit E is a true and correct copy of a September 10, 2023 email from myself to Stephanie Wickouski, Jonathan Young, Sean Feener and Jeffrey Kramer.

8. Attached hereto as Exhibit F is a true and correct copy of a September 14, 2023 email from myself to Stephanie Wickouski, Jonathan Young, Sean Feener and Jeffrey Kramer.

9. Attached hereto as Exhibit G are excerpts of the transcript of the August 29, 2023 hearing before the Court.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Dated: September 15, 2023

/s/ Mitchell P. Hurley
Mitchell P. Hurley